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15 **UNITED STATES DISTRICT COURT**
16 **SOUTHERN DISTRICT OF CALIFORNIA**

17 In re

18 NORTH PLAZA, LLC,

19 Debtor.

20 DYNAMIC FINANCE CORPORATION and
21 ANGELA C. SABELLA,

22 APPELLANTS,

23 v.

24 CHAPTER 11 TRUSTEE RICHARD
25 KIPPERMAN,

26 APPELLEE.

District Case No. 08-CV-01194-W-CAB

Bankruptcy Court No. 04-00769-PB11

Appeal No. 2

**DECLARATION OF TRICIA L.
LEGITTINO IN SUPPORT OF
DYNAMIC FINANCE CORPORATION'S
AND ANGELA SABELLA'S MOTION
FOR STAY PENDING APPEAL OF
ORDER ON THE TRUSTEE'S MOTION
TO COMPEL DISCOVERY FROM
ISAAC LEI AND THE ALCON GROUP**

DATE: To Be Set

TIME: To Be Set

COURTROOM: Seven

The Honorable Thomas J. Whelan, Judge
Presiding

DECLARATION OF TRICIA L. LEGITTINO

I, Michael Gerard Fletcher, declare:

1. I am an attorney admitted to practice before the bar of this Court and am a member of Frandzel Robins Bloom & Csato, L.C., attorneys for secured creditors Angela C. Sabella ("Sabella") and Dynamic Finance Corporation's ("Dynamic") (collectively "Dynamic/Sabella") in this matter. This declaration is in support of Dynamic/Sabella's Motion for a Stay Pending Appeal of the United States Southern District Bankruptcy Court's June 2, 2008 Order (the "Order") on the Trustee's Motion to Compel Discovery from Isaac Lei ("Lei") and his company the Alcon Group ("Alcon") (collectively, "Lei/Alcon") ("Motion"). I have personal knowledge of the matters set forth herein, and I could and would testify competently thereto if called upon to do so.

2. On July 11, 2008 in a telephonic conference with the Court, the parties agreed to the following briefing schedule of this Motion:

a. The Trustee's Opposition is to be filed by July 16, 2008.

b. The Movants' Reply is to be filed on July 21, 2008.

3. The parties also agreed to voluntarily stay enforcement of the Order until July 25, 2008 to allow the Court time to decide the Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed this 11th day of July, 2008, at Los Angeles, California.

/s/ Tricia L. Legittino
TRICIA L. LEGITTINO